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ROBINSON, MCFADDEN & MOORE, P.C.
COLUMBIA, SOUTH CAROLINA

August 13, 2009

VIA ELECTRONIC FILING

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

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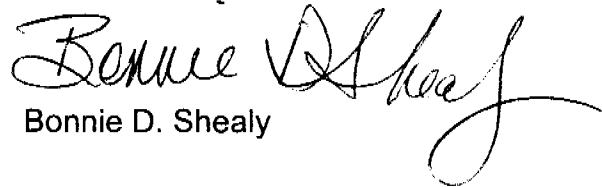
**Re: State Universal Service Support of Basic Local Service Included in a
Bundled Service Offering or Contract Offering
Docket No. 2009-326-C**

Dear Mr. Terrini:

Enclosed for filing please find the Discovery Requests to the Office of Regulatory Staff and Requests to Carriers of Last Resort on behalf of South Carolina Cable Television Association, CompSouth, tw telecom of south carolina llc, and NuVox Communications, Incorporated. By copy of this letter we are serving the same on all parties of record.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.


Bonnie D. Shealy

/bds
enclosure

cc/enc: Parties of record (via email and U.S. Mail)
David Butler, Hearing Examiner (via email and US Mail)
John J. Pringle, Jr., Esquire (via email)
Mr. Ray Sharpe (via email)
Ms. Carolyn Ridley (via email)
Ms. Susan Berlin (via email)

DOCKET NO. 2009-326-C

**SOUTH CAROLINA CABLE
TELEVISION ASSOCIATION,
COMPSOUTH, tw telecom of south
carolina llc, AND NUVOX
COMMUNICATIONS INCORPORATED
REQUESTS TO
CARRIERS OF LAST RESORT**

Pursuant to 26 S.C. Regs. 103-833 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), the South Carolina Cable Television Association, CompSouth, tw telecom of south carolina llc, and Nuvox Communications Incorporated (collectively "CLECs") request that each of the Carriers of Last Resort in South Carolina ("COLRs"), i.e., Windstream South Carolina, formerly known as Alltel South Carolina, Inc.; BellSouth Telecommunications, Inc., doing business as AT&T South Carolina; Bluffton Telephone Co., Inc.; Chesnee Telephone Co., Inc.; Chester Telephone Co., Inc.; Farmers Telephone Cooperative, Inc.; Fort Mill Telephone Co.; Hargray Telephone Co., Inc.; Heath Springs Telephone Co. ("Heath Springs Telephone");¹ Home Telephone Co., Inc.; Horry Telephone Cooperative, Inc.; Lancaster Telephone; Lockhart Telephone Co.; McClellanville

¹ Heath Springs Telephone merged into Lancaster Telephone Co. in 2002 which was approved by Commission Order No. 2002-807 in Docket No. 2002-259-C. For purposes of this discovery request Lancaster should provide any applicable requested information pertaining to Heath Springs individually.

Telephone Co.; Norway Telephone Co.; Palmetto Rural Telephone Cooperative, Inc.; Piedmont Rural Telephone Cooperative, Inc.; PBT Telecom, Inc., formerly known as Pond Branch Telephone Co.; Ridgeway Telephone Co.; Rock Hill Telephone Co.; Sandhill Telephone Cooperative; St. Stephen Telephone Co.; United Telephone Company of the Carolinas, LLC, doing business as Embarq; Verizon South, Inc.; West Carolina Rural Telephone Cooperative; and Williston Telephone Co. each respond to the following interrogatories and/or requests for production pertaining to its own company within twenty days of service:

NO. 1-1

Do you offer and/or provide “Bundled Offerings” as defined by S.C. Code Ann. Section 58-9-285(A)(1)?

NO. 1-2

Do you offer and/or provide “Contract Offerings” as defined by S.C. Code Ann. Section 58-9-285(A)(2)?

NO. 1-3

When you file the *South Carolina Annual Universal Service Fund ILEC Data Report* (“*USF ILEC Data Report*”) with the Office of Regulatory Staff (“ORS”) do you include lines that are provided as parts of “Bundled Offerings” as part of the total number provided in line 1 of the *USF ILEC Data Report*—Number of Residence USF access lines served by Designated Support Service Area rate group (the “Line 1 Total”)? If so, please provide the number of such lines

included in the Line 1 Total for each year beginning in 2005 and continuing through 2008.

NO. 1-4

When you file the *USF ILEC Data Report* with ORS do you include lines that are provided as parts of “Bundled Offerings” as part of the total number provided in line 2 of the *USF ILEC Data Report*—“Number of Single-Line Business USF access lines by USF Designated Support Service Area rate group” (the “Line 2 Total”)? If so, please provide the number of such lines included in the Line 2 Total for each year beginning in 2005 and continuing through 2008.

NO. 1-5

When you file the *USF ILEC Data Report* with ORS do you include lines that are provided as parts of “Contract Offerings” as part of the total number provided in line 1 of the *USF ILEC Data Report*—Number of Residence USF access lines served by Designated Support Service Area rate group (the “Line One Total”)? If so, please provide the number of such lines included in the Line One Total for each year beginning in 2005 and continuing through 2008.

NO. 1-6

When you file the *USF ILEC Data Report* with ORS do you include lines provided as parts of “Contract Offerings” as part of the total number provided in line 2 of the *USF ILEC Data Report*—Number of Single-Line Business USF access lines by USF Designated Support Service Area rate group (the “Line Two Total”)? If

so, please provide the number of such lines included in the Line Two Total for each year beginning in 2005 and continuing through 2008.

NO. 1-7

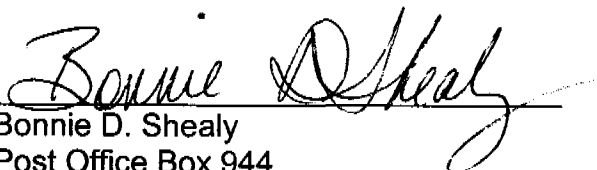
When you file the *South Carolina State USF Per Line Support Calculation* ("USF Calculation") with ORS do you include lines provided as parts of "Bundled Offerings" in the figure provided in line 6—State USF Lines (the "Line Six Total")? If so, please provide the number of such lines by residence and business included for each year in Line Six Total beginning in 2005 and continuing through 2008.

NO. 1-8

When you file the *South Carolina State USF Per Line Support Calculation* ("USF Calculation") with ORS do you include lines provided as parts of "Contract Offerings" in the figure provided in line 6—State USF Lines (the "Line Six Total")? If so, please provide the number of such lines by residence and business included for each year in Line Six Total beginning in 2005, and continuing through 2008.

Dated this 13th day of August, 2009.

ROBINSON, MCFADDEN & MOORE, P.C.


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COUNSEL FOR NuVOX COMMUNICATIONS INCORPORATED

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2009-326-C

IN RE:

State Universal Service Support of Basic
Local Service Included in a Bundled
Service Offering or Contract Offering

CERTIFICATE OF SERVICE

This is to certify that I, Leslie Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **REQUESTS TO CARRIERS OF LAST RESORT ON BEHALF OF THE SOUTH CAROLINA CABLE TELEVISION ASSOCIATION, COMPSOUTH, tw telecom of south carolina, llc, AND NUVOX COMMUNICATIONS INCORPORATED** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Nanette S. Edwards, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC 29211

Burnet R. Maybank, III, Esquire
Nexsen Pruet, LLC
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Post Office Box 752
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Margaret M. Fox, Esquire
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William R. L. Atkinson, Esquire
Sprint Nextel Corporation
233 Peachtree Street, N.E., Suite 2200
Atlanta, GA 30303

Dated at Columbia, South Carolina this 13th day of August, 2009.



Leslie Allen